

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MICHIGAN**

)	
)	
TIMOTHY BOZUNG, individually and on)	
behalf of all others similarly situated,)	
)	
Plaintiff,)	
)	Hon. Hala Y. Jarbou
v.)	Magistrate Judge Ray Kent
)	Case No. 1:22-cv-00304-HYJ-RSK
CHRISTIANBOOK, LLC f/k/a CHRISTIAN)	
BOOK DISTRIBUTORS CATALOG, LLC,)	
)	
Defendant.)	
)	

**DECLARATION OF TIMOTHY BAZZLE IN SUPPORT OF DEFENDANT
CHRISTIANBOOK, LLC’S OPPOSITION TO PLAINTIFF’S MOTION FOR RELIEF
FROM JUDGMENT PURSUANT TO FED. R. CIV. P. 59(e) & FED. R. CIV. P. 60(b)
AND FOR LEAVE TO FILE SECOND AMENDED COMPLAINT PURSUANT TO FED.
R. CIV. P. 15(a)**

I, Timothy Bazzle, declare as follows:

1. I am an attorney at the law firm of Goodwin Procter, LLP. I am counsel for Defendant Christianbook, LLC (“Christianbook” or “Defendant”) in this matter. I am a member of good standing of the bar of the Commonwealth of Massachusetts, and admitted to practice in the United States District Court for the Western District of Michigan. I submit this Declaration in support of Defendant Christianbook, LLC’s Opposition to Plaintiff’s Motion for Relief from Judgment Pursuant to Fed. R. Civ. P. 59(e) & Fed. R. Civ. P. 60(b) and for Leave to File Second Amended Complaint Pursuant to Fed. R. Civ. P. 15(A).

3. Attached hereto as **Exhibit 1** is a true and correct copy of Christianbook.com’s Privacy Policy (last updated on November 29, 2010) and Bates-stamped CB00000053-56.

4. Attached hereto as **Exhibit 2** is a true and correct copy of a spreadsheet Bates-stamped CB_00000361 and designated as “Confidential” by Christianbook pursuant to the Confidentiality Agreement and Stipulated Protective Order entered on December 8, 2022 (ECF No. 35).

5. Attached hereto as **Exhibit 3** is a true and correct copy of a January 19, 2022 letter K. Rossman, IV sent to P. Fraietta regarding Subpoena to Wiland in Bozung v. Christianbook, Case No. 1:22-cv-00304-HYJ-RSK, enclosing Wiland’s objections to Plaintiff’s third-party subpoena.

6. Attached hereto as **Exhibit 4** is a true and correct copy of a document Bates-stamped EXP_000001 and designated as “Confidential” pursuant to the Confidentiality Agreement and Stipulated Protective Order entered on December 8, 2022 (ECF No. 35).

I declare under the penalty of perjury that the foregoing is true and correct.

Executed on this 4th day of April, 2023 in Boston, Massachusetts.



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Dated: April 4, 2023

Respectfully submitted,

/s/ Timothy Bazzle

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CERTIFICATE OF SERVICE

I hereby certify that, on April 4, 2023, a true and correct copy of the foregoing was electronically filed with the Clerk of the Court by using the CM/ECF system, which caused it to be served on all counsel of record.

/s/ Timothy Bazzle
Timothy Bazzle